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FEDERAL COMMUNICATIONS COMMISSION
WASHINGTON, D.C. 20554

In the matter of)) Application by New York Telephone Company) (d/b/a Bell Atlantic-New York), Bell Atlantic) Communications, Inc., NYNEX Long Distance) Company, and Bell Atlantic Global Networks, Inc.,) for Authorization to Provide In-Region,) InterLATA Services in New York)	CC Docket No. 99-295

REPLY DECLARATION OF JOHN G. DONOGHUE
ON BEHALF OF MCI WORLDCOM, INC.

Based on my personal knowledge and on information learned in the course of my duties,

I, John G. Donoghue, declare as follows:

1.   My name is John G. Donoghue. I am Senior Vice President of Marketing

and Advertising for MCI WorldCom. I have previously offered a declaration on behalf of MCI

WorldCom in the opening round of comments in this proceeding, filed October 19, 1999, and my

background is set forth therein.

2.   The purpose of this declaration is to explain MCI WorldCom's local mass

markets service offerings, as well as MCI WorldCom's promotion of those services.

3.   As noted in my opening joint declaration with Ronald J. McMurtrie, MCI

WorldCom first introduced its mass markets local offering using the UNE-platform less than one

year ago, in December 1998. Such UNE-platform-based residential service has been available

throughout BA-NY's territory in New York since February 1999. Through the middle of

October 1999, MCI WorldCom marketed these services almost entirely through outbound

telemarketing,[1] initially targeted at MCI WorldCom's existing long distance customers, which it

began to expand gradually to other prospects, beginning in July 1999. As its telemarketing

efforts reached more customers, MCI WorldCom also experienced an increase in inbound calls

from consumers interested in MCI WorldCom local service who became aware of the company's

offerings through word of mouth.

4.   MCI WorldCom's local service offerings provide customers savings over

Bell Atlantic, and to maximize customer benefits, most MCI WorldCom local services are

promoted in combination with long distance services, offering customers MCI WorldCom's

lowest long distance rates as well as additional discounts on their overall bill for purchasing

bundled services. A description of MCI WorldCom local service offerings currently being

marketed in New York is attached as an exhibit to this declaration.

5.   As it does today, in the future MCI WorldCom expects to sell most local

service as part of an integrated package including local, interLATA and intraLATA services.

Ultimately, MCI WorldCom ** REDACTED .** To reach this goal requires providing reliable,

competitive local service and making the public aware of that fact.

6.   MCI WorldCom has just begun its first modest television advertising

designed to promote public awareness of its local service products and packages. On October 25,

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1/   MCI WorldCom also used a very limited amount of direct mail advertising between the
inception of service and the filing of its opening comments in this proceeding.

1999, MCI WorldCom began ** REDACTED.**

7.   These advertisements are designed to familiarize consumers with MCI WorldCom as a local service provider and thus complement and increase the effectiveness of MCI WorldCom's ongoing telemarketing. The company hopes, of course, that increased awareness will also generate additional inbound requests for service from consumers. MCI WorldCom tentatively projects that this marketing effort will result in a modest increase in sales. Given the novelty of competition in local service, however, actual response is very difficult to predict.

8.   MCI WorldCom's current marketing efforts are thus a first step toward marketing its local residential service offerings on a par with its existing long distance service. But the success of this effort depends in large part upon the performance of BA-NY and MCI WorldCom OSS in processing the gradually increasing volumes of orders that these marketing efforts are expected to generate. If BA-NY's improvements and developments do not proceed and work as promised, or if existing systems are not sufficiently robust to handle increased volumes, MCI WorldCom will have to curtail its marketing efforts to avoid service-effecting harms that will undermine its reputation with its existing customer base and in the marketplace.

9.   This concludes this declaration.

I declare, under penalty of perjury under the laws of the United States of America, that the

foregoing is true and correct to the best of my knowledge and belief.

Executed on November __5__, 1999.

John G. Donoghue

SUPPLEMENTAL DECLARATION OF JOHN G. DONOGHUE

ATTACHMENT 1

SUMMARY OF MCI WORLDCOM
RESIDENTIAL LOCAL EXCHANGE SERVICES
MARKETED IN NEW YORK STATE
(NOVEMBER 8, 1999)

MCI WorldCom Local Advantage 100[sm] (Upstate Only)

$19.99 per month Line Fee
100 local calls included
$0.05 per local call thereafter

MCI WorldCom Local Savings 100[sm] (Downstate Only)

$14.99 per month Line Fee
100 local calls included
$0.05 per local call thereafter

MCI WorldCom Local Savings[sm] (Downstate Only)

$6.27 per month Line Fee
Local calls priced by time-of-day

Day Rate:	M-F 8am-9pm	$0.10/call
Evening:	M-F 9pm-11pm Sun. 5pm-11pm	$0.06/call
Night/Weekend:	M-F 11pm-8am All Day Sat. Sun. Until 5pm and after 11pm	$0.03/call

Integrated Benefits for Local/Long Distance Customers (Upstate and Downstate)

New customers who subscribe to MCI WorldCom local calling plans described
above, intraLATA service, and one of the actively marketed MCI WorldCom long
distance plans receive a $5 credit each month on their phone bill.

1

This document is for summary purposes only. For complete terms and conditions, see official tariffs filed
with the NY Public Service Commission.

Non-Recurring Charges (Upstate and Downstate)

Service Order Charge	$16.00
Lifeline Connection Charge	$10.00
Record Order Charge	$10.00
Line Connection Charge	$39.00
Cancel Call Blocking	$0.00
Referral Service for Movers	$0.00
InterLATA PIC Change	$5.00
IntraLATA PIC Change	$5.00
Restoral of Service Charge (for non-payment)	$36.00
Restoral of Lifeline Service (for non-payment)	$10.00
Check Return Charge	$10.00
Premise Visit Charge	$66.09
New Telephone Number Charge (one line)	$85.25
New Telephone Number Charge (multiple lines)	$114.57

Residential Recurring Charges (Upstate and Downstate)

Non-published Number	$1.95
Directory Listing	$0.00
Additional Listing	$1.97

Feature Offerings (Upstate and Downstate)

Call Waiting	Call Waiting ID
Three-Way Calling	Call Waiting ID w/ Name
Speed Dial 8 & 30	Selective Blocking for Caller ID
Call Forwarding	Complete Blocking for Caller ID
Call Forwarding – Busy	Anonymous Call Rejection
Call Forwarding – No Answer	Third Party and Collect Call Blocking
Call Return	Third Party Blocking
Repeat Dialing	900/976 Blocking
MultiRing-2	Toll Blocking
MultiRing-3	International Dialing Blocking
Caller ID w/ Number Only	Call Trace
Caller ID w/ Name and Number	

2

Other Notable Items (Upstate and Downstate)

       Directory Assistance & Operator Assistance Fees Apply
       Lifeline Product Offered
       Text Telephone Service Offered
       TTY/TDD Discounts Offered
       Feature Discounts Offered
       Airline Affinity Promotions Offered

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In the matter of	)	
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Application by New York Telephone Company	)	
(d/b/a Bell Atlantic-New York), Bell Atlantic	)	
Communications, Inc., NYNEX Long Distance	)	CC Docket No. 99-295
Company, and Bell Atlantic Global Networks, Inc.,	)	
for Authorization to Provide In-Region,	)	
InterLATA Services in New York	)	

SUPPLEMENTAL JOINT DECLARATION OF
SHERRY LICHTENBERG AND JOHN SIVORI
ON BEHALF OF MCI WORLDCOM, INC.

Based on our personal knowledge and on information learned in the course of our duties, we, Sherry Lichtenberg and John Sivori, declare as follows:

1. My name is Sherry Lichtenberg. I am Senior Manager for Product Development for MCI WorldCom. My duties include designing, managing, and implementing MCI WorldCom's local telecommunications services to residential customers on a mass market basis in New York and nationwide, including operations support systems and facilities testing. Additional biographical details appear in my October 19 Declaration in this proceeding.

2. My name is John Sivori. I am Senior Manager in MCI WorldCom's Information Technology Organization. My duties include the planning and implementation of electronic interfaces for pre-ordering and ordering operations in support of MCI WorldCom's entry into local telecommunications markets in the region served by Bell Atlantic. Additional biographical details appear in my October 19 Declaration in this proceeding.

3.   The purpose of this Supplemental Declaration is to respond to the

comments submitted by other interested parties in these proceedings, including in particular the

recommendations filed by the United States Department of Justice ("DOJ") and the New York

Public Service Commission ("NYPSC"), as they relate to BA-NY's providing access to its

Operations Support Systems ("OSS"). In this Declaration, we also discuss the recently released

carrier-to-carrier performance data for BA-NY for the month of September, which shows that

BA-NY is still failing to provide adequate flow-through order processing and continues to

struggle with its change management performance.

4.   In addition, we provide updates on the problems and deficiencies

highlighted in our previous Declaration. We describe that MCI WorldCom's pre-ordering

interface continues to suffer from almost daily outages and that the shortcomings of BA-NY's

help desk have been painfully apparent in the face of these problems. We also describe two new

issues. Since our October 19 filing, MCI WorldCom has had considerable problems with BA-

NY's new GUI III interface and has requested that BA-NY postpone decommissioning the

current GUI interface. Also, we recently learned that more than 10,000 of MCI WorldCom's

UNE-platform orders have been lost in BA-NY's systems. Efforts to address these problems are

ongoing.

5.   In sum, the OSS deficiencies discussed in MCI WorldCom's opening

comments remain obstacles to our efforts to sustain increasing numbers of local customers in

New York. And, unfortunately, new problems have arisen that must be addressed as well, if

MCI WorldCom is going to compete effectively and sustainably against BA-NY.

I.   MCI WorldCom's Electronic Data Interchange ("EDI") Interface for Pre-Ordering Continues to Suffer from Frequent Outages and Delayed Response Times.

6.   Having reliable and timely "parsed" CSR information is the most

important of the pre-ordering subfunctions. As we discussed in our prior Declaration, the CSR

provides the basic customer information needed to place an order for service without risking that

the order will be rejected. Lichtenberg & Sivori Initial Decl. ¶ 47. A "parsed" CSR is a CSR in

which the customer's pre-ordering information has been separated into distinct fields, so that the

CLEC can take that information and automatically populate an order for service. When MCI

WorldCom receives a parsed CSR, the sales representative does not have to retype the name,

address, and other customer information into the order. The parsed CSR is the feature that makes

it possible to integrate BA-NY's pre-ordering and ordering functions. This is why it was the first

pre-ordering subfunction developed by MCI WorldCom.

7.   MCI WorldCom must be able to make use of the parsed CSR subfunction

if it is to process commercially significant quantities of platform orders.[1] It also needs to receive

parsed CSRs from BA-NY quickly. MCI WorldCom customer service representatives "pull"

CSRs when they make their first contact with potential new customers, and they need the

information contained in the CSRs to understand the kind of service the customers currently are

receiving, and to submit the customers' orders, should they choose to switch to MCI WorldCom.

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[1]   Note that having access to parsed CSRs should eliminate the principal cause of the so-called "CLEC error" that has contributed to the high percentage of orders which do not flow-through BA-NY's ordering systems. See infra ¶ 15.

8.   BA-NY's customer service representatives can access a CSR almost

instantaneously. MCI WorldCom needs response times from BA-NY no longer than 10 seconds,

especially during peak selling hours in the evenings.[2] It is difficult enough to construct a script

for a representative that allows her to keep the customer on the line for 30 seconds while the CSR

is being pulled -- 10 seconds of BA-NY response time in addition to 20 seconds of transport time

and processing time within MCI WorldCom's systems. Response times any longer than that are

a substantial barrier to entry. Many customers will simply hang up the phone rather than wait for

an indeterminate period while their CSR is being pulled.

9.   In our initial Declaration, we discussed the problems that MCI WorldCom

is having with the parsed CSR functionality. We explained that the interface was unstable and

was suffering from periodic outages. Lichtenberg & Sivori Initial Decl. ¶ 61. We reported our

concern that the response times for the parsed CSR queries were excessive -- averaging from 15

to 20 seconds. Id. ¶¶ 62-63. We also noted that BA-NY had recently informed MCI WorldCom

that it would not be providing parsed CSRs for ISDN lines, a limitation that had not been

discussed previously. Id. ¶ 64. These deficiencies have not been remedied; indeed, in at least

one respect they have gotten worse.

10.   First, MCI WorldCom's parsed CSR interface continues to experience

frequent outages. In our initial Declaration, we reported that the interface had been down eleven

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2/   Although parsed CSRs have no retail analogue, the NYPSC recently established a
performance standard of "ten seconds plus parity with retail CSR" for parsed CSRs. Order
Establishing Additional Inter-Carrier Service Quality Guidelines and Granting in part Petition for
Reconsideration, Clarification, and Stay, Case No. 97-C-0139, at 15 (NYPSC Nov. 5, 1999). In
practice, this should require response times of approximately eleven seconds.

times from its release into production on September 3 to October 14. Id. ¶ 61. Since that time,

we have experienced outages almost daily, with the interface going down eighteen additional

times. See Bell Atlantic - New York Pre-Order Trouble Tickets, appended as Attachment 1 to

this Supplemental Declaration. MCI WorldCom and BA-NY continue to work to address these

problems. See Letter from A. O'Neill (MCI WorldCom) to J. Ross (BA-NY), dated Nov. 5,

1999 (outlining steps BA-NY promised to take after recent meeting), appended as Attachment 2

to this Supplemental Declaration. MCI WorldCom remains hopeful that these issues can be

resolved, but every day the outages persist makes us more concerned with the commercial

viability of the interface, and with BA-NY's ability to stabilize it.

11.   Second, the problem identified in our earlier Declaration regarding

delayed response times for parsed CSRs has gotten substantially worse. MCI WorldCom is

finding that BA-NY's response times become significantly longer as the volume of transactions

increase. BA-NY's response times are going from 10 to 15 seconds during the day (9:00 am to

5:00 pm) to 20 to 40 seconds in the evenings (6:00 pm to 9:00 pm), when volumes increase.[3/]

Many customers simply will not wait that long on the phone while MCI WorldCom

representatives access the CSRs. MCI WorldCom needs predictable response times of 10

seconds or less, and peak period response times that are two to four times that long are plainly

unacceptable. Moreover, the increased response times in the evenings raise serious questions

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3/   For its part, MCI WorldCom has worked to get the processing time on its side of the
interface down to under 20 seconds for parsed CSRs, and its times do not vary with the volumes
of transactions.

about the capacity of BA-NY's pre-ordering systems and databases to handle commercial

volumes.

12.   Third, promptly upon learning that BA-NY's systems would not provide

parsed CSRs for every order type, MCI WorldCom asked BA-NY to clarify the services for

which it is prepared to provide parsed CSRs. BA-NY has not definitely responded, and has not

agreed to a schedule for developing and implementing parsed CSRs for ISDN service.

13.   One positive development since our October 19 submission is that MCI

WorldCom has moved a limited address validation subfunction into production for UNE-

platform orders. On November 1, 1999, MCI WorldCom began validating addresses using the

customer's working telephone number using the EDI interface. As discussed in our initial

Declaration, because new customers do not have working telephone numbers, MCI WorldCom

cannot yet validate addresses for new customers, which remains a significant deficiency.

Lichtenberg & Sivori Initial Decl. ¶ 56 n.7. Nonetheless, implementing even partial address

validation functionality represents another positive step toward achieving nondiscriminatory

access to BA-NY's OSS.

II.   BA-NY Continues to Rely on Excessive Manual Intervention.

14.   BA-NY's OSS for ordering continues to require excessive manual

processing. Providing flow-through processing for the vast majority of orders is critical because

BA-NY's processes must be scalable not only to handle today's limited volumes but tomorrow's

increased commercial volumes as well. CLECs also need flow-through order processing

because, in a robust competitive environment, in which BA-NY intensifies its efforts to retain

customers and win back those it has lost, MCI WorldCom and other CLECs will have to

complete orders and provision service as quickly as BA-NY -- not in the longer intervals MCI

WorldCom allows BA-NY today. Such parity of service requires service within two days, and

simply is not possible if CLECs must wait 24 hours for manual FOCs and rejects (as opposed to

two hours for flow-through FOCs and rejects). Excessive reliance on manual processing -- even

if not causing significant problems at low order volumes in this early stage of competition -- is

unacceptable.[4]

     15.   In our initial Declaration, we showed that BA-NY's flow-through rates for

MCI WorldCom's basic residential POTS orders were inadequate. Lichtenberg & Sivori Initial

Decl. ¶ 104 (noting that for May, June, July, and August, BA-NY only flowed through

REDACTED, **REDACTED**, **REDACTED**, and **REDACTED** of MCI

WorldCom's UNE-platform orders, respectively). We also showed that, as a result of the poor

flow-through performance, BA-NY was having difficulty processing manual FOCs and rejects

on time. Id. ¶¶ 122-123 (explaining that BA-NY failed to satisfy the timing standards set out in

the Carrier-to-Carrier Guidelines for manual FOCs and rejects for May, June, July, and August).

In addition, we demonstrated that BA-NY was primarily responsible for the lack of flow-

through. We pointed out that all available evidence indicates that BA-NY error and BA-NY

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[4]   Customers ordering new lines of course need speedy service because every hour service
is delayed is an hour they are without phone service at all. Customers migrating from BA-NY to
MCI WorldCom often are eager to make the change in order to benefit from new features and
superior prices and service they have selected. If MCI WorldCom cannot provide the new
service quickly, customers become frustrated and understandably blame MCI WorldCom for the
delay.

system design account for approximately 70% of the orders falling to manual processing and that

BA-NY is also responsible for many of the orders being dropped to manual due to what BA-NY

refers to as "CLEC error." The real source of much so-called "CLEC error" is BA-NY's failure

to explain its business rules and its failure to provide (until recently) integrated pre-ordering and

ordering interfaces. Id. ¶¶ 105, 109-111.

16.   In September, BA-NY processed **REDACTED** of MCI WorldCom's

UNE-platform orders on a flow-through basis, and again failed to meet the required standard for

processing manual FOCs and reject notices.[5] Because BA-NY's first set of enhancements were

not implemented until October 30, and are therefore not reflected in the September data, the

modest improvement in its flow-through rate is either the result of decreases in the number of

BA-NY and MCI WorldCom errors, or a difference in the composition of the orders sent in

September. In any event, BA-NY is still dropping far too many of MCI WorldCom's orders to

manual processing. If BA-NY is not going to handicap MCI WorldCom's launch into local

markets, BA-NY must increase its flow-through rates at least to 90% -- as it has promised to do.

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[5]   In September, BA-NY reports **REDACTED** timeliness for manual FOCs and
REDACTED timeliness for rejects on MCI WorldCom orders. See BA-NY Carrier-to-
Carrier Reports for September, MCI Performance, Ordering - UNE POTS/Special Services,
POTS/Pre-qualified Complex - Electronically Submitted, Order Confirmation Timeliness Metric
OR-1-04 (% On Time LSRC < 10 Lines) and Reject Timeliness Metric OR-2-04 (% On Time
LSR Reject < 10 Lines). While BA-NY has managed to improve its manual processing figures
by staffing up in recent months, this is not an acceptable fix in the short or long term.

III.   MCI WorldCom Recently Discovered that Thousands of its UNE-Platform Orders Have Been Lost in BA-NY's Systems.

17.   An old problem that BA-NY claimed to have long since resolved has resurfaced since MCI WorldCom filed its initial comments. MCI WorldCom has discovered that significant numbers of its UNE-platform orders, many dating as far back as August, have not received firm order confirmations ("FOCs") and notices of completion ("NOCs").

18.   Lost FOCs and NOCs could have serious consequences for MCI WorldCom's local business. Without FOCs, MCI WorldCom cannot confirm the scheduled due dates for service to its customers, or keep its customers informed as to the status of their orders. Without final NOCs, MCI WorldCom is deprived of revenue because it cannot begin billing a customer until it is certain that the customer's order has cleared BA-NY's billing systems. Otherwise, the customer would be billed by both BA-NY and MCI WorldCom. In addition, the lack of completion notices can lead to considerable customer confusion and inadequate customer service. Until a customer's order clears BA-NY's systems, MCI WorldCom cannot help them with billing problems or even address trouble with their service. Also, customers who believe they have switched their service to MCI WorldCom may not pay their BA-NY bills and, as a result, could lose service altogether. These are customer-affecting failures that customers will undoubtedly attribute to MCI WorldCom, and they can severely damage MCI WorldCom's reputation as it seeks to become a respected and reliable local service provider.

19.   While BA-NY has known about the problem for some time, it has been slow to address it, and substantial numbers of orders remain outstanding. As of the November 4, the totals were as follows:

August

No FOC received	28 orders
No NOC received	423 orders

September

No FOC received	374 orders
No NOC received	3466 orders

October

No FOC received	741 orders
No NOC received	5932 orders

Totals

No FOC received	1143 orders
No NOC received	9821 orders[6/]

20.   BA-NY states that for approximately half of the orders for which MCI

WorldCom has not received NOCs in August and September, BA-NY issued FOCs to MCI

WorldCom, but the orders progressed no further in its systems. The cause of the problem

remains unknown. For the remaining orders in that category, BA-NY received the orders, issued

FOCs to MCI WorldCom, provisioned service to the customers, issued completion notices to

MCI WorldCom indicating that service had been provisioned ("provisioning completion notices"

or "PCNs"), but the orders have not cleared its billing systems, so BA-NY has not issued the

final NOCs ("billing notices of completion" or "BCNs"). If MCI WorldCom began billing its

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6/   Because the metrics under the Carrier-to-Carrier Guidelines do not account for missing notices of completion, despite the significant number of lost orders, BA-NY has been able to report perfect performance in delivering timely completion notices. See BA-NY Carrier-to-Carrier Reports, CLEC Aggregate Performance, Ordering - UNE POTS/Special Services, Timeliness of Completion Notification, Metric OR-4-01 (Completion Notice -- % On Time) (reporting 100% timeliness); BA-NY Carrier-to-Carrier Reports, MCI Performance, Ordering - UNE POTS/Special Services, Timeliness of Completion Notification, Metric OR-4-01 (Completion Notice -- % On Time) (reporting 100% timeliness).

customers at this point, they would be double billed. MCI WorldCom cannot safely bill

customers under these circumstances.[7]

21.   While all of the causes for the backlog have not been identified, it is clear

that part of the problem lies in the fact that many CLEC orders are dropping to manual

processing after service has been provisioned but before they have cleared BA-NY's billing

systems. MCI WorldCom has learned, for example, that BA-NY drops local service orders to

manual processing if there is a pending change order for that customer's long distance service (a

"PIC/LPIC" change). Manual processing in these circumstances is completely unnecessary

because there should be no conflict between the local service order and the PIC/LPIC change

order. Because manual processes like these inevitably lead to errors and delays, BA-NY must

eliminate all such unnecessary manual handling.

22.   As we indicated above, this is not a new problem. In June 1999, MCI

WorldCom determined that there were more than 10,000 orders outstanding for which we had

not received notices of completion. BA-NY recognized the seriousness of the problem, and

worked with MCI WorldCom over the course of many weeks to resolve the backlog. During that

time, MCI WorldCom and BA-NY identified a number of causes for the lost orders, including

billing errors, mismatches between BA-NY's EIF and the EDI transmissions, problems with BA-

NY's EDI translator, and difficulties with a new OSS interface software release. See Joint

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[7]   Specifically, BA-NY says that 179 (48%) of the 423 orders in August for which MCI
WorldCom has not received NOCs have a "confirmed" status in BA-NY's systems, indicating
that BA-NY sent FOCs but did not provision service. For the September orders, BA-NY states
that 1789 (52%) of the 3466 orders without NOCs were not provisioned.

Supplemental Affidavit of Karen Kinard, Sherry Lichtenberg, and John Sivori on Behalf of MCI

WorldCom, Inc., Case 97-C-0271, at 7-9 (NYPSC June 30, 1999) (BA-NY App. C, Tab 817).

23.   At the time, BA-NY assured MCI WorldCom that it had identified and

resolved the various problems and had taken steps to ensure that orders would not be lost in the

future.[8/] MCI WorldCom requested that BA-NY provide specific explanations for the lost orders

and the steps taken to protect against their recurring, but BA-NY never provided that

information. The problems have now resurfaced. As before, MCI WorldCom is asking that BA-

NY provide accurate FOCs and NOCs for these customers and that BA-NY work with MCI

WorldCom to resolve the problems with its ordering systems. In addition, this time, BA-NY

should provide detailed explanations for the lost notices as well as for all steps taken to resolve

the problems. BA-NY has not yet responded to MCI WorldCom's request. This is a problem

that must be solved permanently if MCI WorldCom is to remain a competitive presence in New

York.

IV.   BA-NY Continues to Provide Inadequate Change Management Support.

A.   BA-NY's Change Management Performance Has Worsened.

24.   BA-NY's poor change management performance continues. While BA-

NY has yet to provide data for many of the key change management metrics (e.g., software

validation (PO-6-01) and timely resolution of software problems (PO-7-01, PO-7-02, PO-7-04)),

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8/   KPMG also identified this problem through its testing, and, like MCI WorldCom, it was
told by BA-NY that the problem had been resolved.

the data that is available shows that BA-NY's performance has worsened.[9] The only new change

management data relates to emergency maintenance changes, and the metric measuring the

percentage of emergency notices sent on time (PO-4-01) dropped from 70% in August to 58% in

September.[10] Moreover, the notices that BA-NY does issue continue to come only at the

prompting of the CLECs. See Lichtenberg & Sivori Initial Decl. ¶ 138. Under the change

management rules for emergency changes, BA-NY is required to page specified CLEC

representatives whenever it discovers an outage. Even with all of the pre-order outages that MCI

WorldCom has experienced in recent weeks, BA-NY has consistently failed to page our contacts.

MCI WorldCom cannot sustain its competitive entry into local markets if MCI WorldCom can

be taken out of business by BA-NY without notice. BA-NY must significantly improve its

performance with regard to emergency changes.

B.   BA-NY Continues to Provide Poor Interface Management.

        25.   BA-NY still struggles with basic interface management. BA-NY

continues to shut CLECs -- the ultimate users of these systems and interfaces -- out of the change

management process and consistently fails to conduct sufficient testing of new interfaces before

releasing them. The latest example of BA-NY's poor release management is its roll out of the

new Graphical User Interface ("GUI") III. MCI WorldCom has found the new interface so

unreliable that it has had to discontinue its use.

9/   See BA-NY Compliance Filing, New York State Carrier-to-Carrier Guidelines
Performance Standards and Reports, Case No. 97-C-0139, at 13-14 (NYPSC July 12, 1999).

10/   Id. at 11.

26.   BA-NY unilaterally determined to move the CLECs from the GUI II to the

GUI III, which it claims provides enhanced access to its OSS. The GUI is, in fact, the only mode

of access to BA-NY's pre-ordering, ordering, and repair and maintenance functions for the vast

majority of CLECs. Although MCI WorldCom is working to implement application-to-

application interfaces (e.g., EDI for pre-ordering and ordering and an Electronic Bonding

Interface for repair and maintenance), MCI WorldCom still must use the GUI for key pre-

ordering transactions,[11] repair and maintenance, and, to a limited extent, for ordering.[12]

27.   BA-NY decided that the roll out schedule for the GUI III would be as

follows. From October 17 through November 13, both the GUI II and GUI III are to be

available. From November 14 through November 27, CLECs may use either interface, but any

data entered in the GUI II must later be transferred to the GUI III by the CLECs using a cut and

paste method. On November 28, BA-NY will decommission the GUI II entirely. If BA-NY

keeps to this schedule, it will jeopardize the operation of every CLEC in New York, including

MCI WorldCom.

11/   As we explained in our October 19 Declaration, in order to avoid having to use the GUI,
MCI WorldCom has developed imperfect workarounds for many of the pre-ordering
subfunctions, like address validation, due dates, and service and feature availability. Lichtenberg
& Sivori Initial Decl. ¶¶ 65-69. As a result, MCI WorldCom uses the GUI only for telephone
number selection and reservation during the pre-ordering phase. Our latest figures show that we
are reserving approximately **REDACTED** new numbers per hour or **REDACTED** to
REDACTED numbers per week through the GUI.

12/   MCI WorldCom uses the GUI to resend "escalated" orders, which are orders for
customers whose service was not turned up on their requested due date. MCI WorldCom
processes anywhere from **REDACTED** to **REDACTED** such orders each week.

28.   MCI WorldCom has experienced serious difficulties with the new GUI.

MCI WorldCom began limited testing of the GUI III in September 1999, and by October 25,

MCI WorldCom personnel had completed training and were ready to begin using the new

interface. MCI WorldCom quickly learned, however, that the interface was not ready for use in

production.

29.   MCI WorldCom representatives have had significant problems logging on

to the GUI III, sometimes having to attempt to log on four or fives times before finally

succeeding in entering BA-NY's system. Representatives have also encountered extremely long

delays in the GUI's response times. In addition, the interface has proven unreliable. In order to

achieve quicker response times and to avoid having to use BA-NY's secure identification cards,

in October, MCI WorldCom accepted BA-NY invitation to transition from BA-NY's Telnet

access to the GUI to direct internet access. The move has proven disastrous. Eight times from

October 11 through November 1, BA-NY announced that its internet access was unavailable.

And, even when the interface has been accessible, MCI WorldCom has experienced frequent

GUI outages, with a total of seven since October 28.

30.   MCI WorldCom is also concerned with the functionality of the GUI III.

MCI WorldCom now understands that, unlike the GUI II, the GUI III permits only the sales

representative who created an order to edit that order, and only the customer service

representative who opened a trouble ticket to check the status of that ticket. This is unworkable

in a production environment because when a customer calls in to change his order or check the

status of his trouble ticket, he is not likely to get the same MCI WorldCom representative that he

dealt with originally. In order to provide adequate service to customers, our representatives must

have access to any customer's order or trouble ticket, not just those for which the particular

representative is personally responsible. This is common sense, but it is a functionality not

available on the new GUI III.

31.   MCI WorldCom and the other CLECs have asked BA-NY to postpone

decommissioning the GUI II for at least 90 days so that these problems can be addressed and the

interface adequately tested. BA-NY has agreed to a two week delay in shutting down the GUI II,

but that is not enough time to address the problems and retest the interface. BA-NY makes the

same mistake again and again: rushing inadequately tested releases into production and leaving

CLECs to discover the many problems with the interfaces during their testing or in production.

This is plainly unacceptable interface management.

C.   BA-NY's Help Desk Support Has Not Improved.

32.   KPMG left the New York testing process "not satisfied" with BA-NY's

help desks,[13] and MCI WorldCom fears that BA-NY has not sufficiently addressed the

deficiencies identified by KPMG and CLECs. Since filing its comments on October 19, MCI

WorldCom has continued to find BA-NY's help desk service consistently unacceptable. MCI

WorldCom has found that BA-NY's help desk attendants are often not knowledgeable enough to

understand, much less resolve, the reported problems. In many cases, the MCI WorldCom

personnel have to explain even rudimentary facts about MCI WorldCom's interfaces, like the

_____

13/   KPMG Final Report, Table IV-9.7, P9-16, at IV-218; see also KPMG Closure Report of
Exception 45.

basic characteristics of the TCP/IP/SSL3 connection with BA-NY for pre-ordering. As one of

BA-NY's largest wholesale customers, we would expect BA-NY service representatives to have

a working knowledge of this information.

33.   Help desks calls are also taking far too long. In several instances, BA-NY's help desk staff have refused to open trouble tickets on problems and, instead, have put MCI WorldCom personnel on hold (sometimes for more than 45 minutes) while they have tried to address the difficulty. As a threshold matter, BA-NY should never refuse to open trouble tickets. MCI WorldCom uses its log of trouble tickets to monitor the performance of its interfaces. In addition, a CLEC should be able to contact the help desk, report the problem, and have the BA-NY help desk representative open a trouble ticket and begin addressing the problem in a matter of minutes. CLEC representatives should not be unnecessarily tied up explaining the basic technology issues or required to hold on the line while BA-NY works on the problem.

34.   Moreover, BA-NY is still failing to follow up on trouble tickets or to provide root cause analysis for problems after they have allegedly been addressed. As we explained in our initial comments, if BA-NY does not provide MCI WorldCom with the root causes of interface problems and outages, MCI WorldCom cannot take the steps necessary to prevent future problems or make recommendations to BA-NY for changes it can make to ensure that the problems do not resurface. Lichtenberg & Sivori Initial Decl. ¶ 140. The fact that BA-NY is again failing to process thousands of MCI WorldCom orders is a good example of the importance of providing detailed follow up explanations for purported fixes. As discussed above, see supra ¶¶ 22-23, had BA-NY explained the cause of these problems in June when they
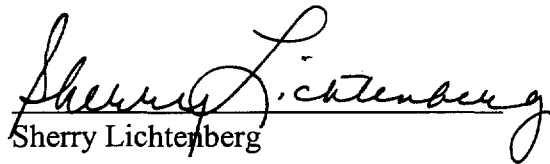
first arose, MCI WorldCom could have worked with BA-NY to see that the difficulties did not

return. If MCI WorldCom had known in June, for example, that BA-NY was dropping local

service orders to manual processing simply because there were long distance change orders

pending, see supra ¶ 21, we would have insisted that the practice be stopped, and this issue

would not be a problem today.

35.   BA-NY has apparently not learned this lesson. It has yet to provide

explanations for most of the problems MCI WorldCom has experienced with its EDI interface for

pre-ordering. See supra ¶ 10. BA-NY must improve its help desk service if it is not going to

undermine sustained competition in New York.
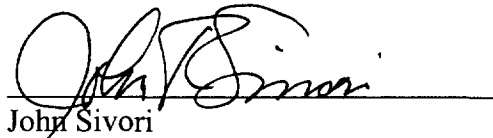
V.   **Conclusion**

36.   This concludes our Supplemental Joint Declaration on Behalf of MCI

WorldCom.

I declare under penalty of perjury under the laws of the United States of America that the foregoing Supplemental Joint Declaration on Behalf of MCI WorldCom is true and correct to the best of my knowledge and belief.

Sherry Lichtenberg

November 8, 1999

I declare under penalty of perjury under the laws of the United States of America that the foregoing Supplemental Joint Declaration on Behalf of MCI WorldCom is true and correct to the best of my knowledge and belief.

John Sivori

November 8, 1999

SUPPLEMENTAL JOINT DECLARATION OF SHERRY LICHTENBERG AND JOHN SIVORI

ATTACHMENT 1

752123		9/1/99	OPEN	None to Date	Outage during testing that impacted production	
754780	Non Uniform Response Times	9/3/99	OPEN	None to Date	Timeout conditions	
754776	No Response	9/3/99	OPEN	None to Date	Non Response Transaction	
762691	No Response	9/14/99	OPEN	None to Date	Non Response Transaction	
762755	No Response	9/15/99	10/1/99	None to Date	No response from BAN concerning several transactions sent by MCI.	BAN checked and did not find a record of these transactions. They asked us to re-send.
770826	No Response	9/24/99	OPEN	None to Date	No response from BA (Production) until trouble ticket was opened. Still need to understand what the problem entailed.	
772205	No Response	9/27/99	9/28/99	None to Date	Did not receive response for INQNUMs (00013598BANSXEPX through 00013642BANSXEPX) after 4:20 PM. SSL3 handshake is failing probably because the BA server is not responding.	This was a MCI WorldCom internal connection problem that has been corrected.
772487	No Response	9/28/99	OPEN	None to Date	**TCPIP Failure** Here are the INQNUMs after 4:20 PM today for which we did not receive any response. 00013598BANSXEPX through 00013642BANSXEPX Actually, a detailed look at our log files showed that our SSL3 handshake is failing because (probably) the BA server is nor responding. So you might not have received these INQNUMs today.	.
775755	Non Uniform Response Times	10/1/99	10/1/99	None to Date	Type 1 Sev 1 - CR # 775755 - CLEC receiving slow responses processing CSRs via EDI	This was a MCI WorldCom internal connection problem that has been corrected.
	No Response					
777551	Non Uniform Response Times	10/4/99	10/4/99	Yes, after ticket was opened	All the orders we are trying to send (including the queued up ones) are not getting responses from BAN. After investigation, it was found that the outbound inquiries did not make it to BAN since our handshake failed. The last good transaction was at 12:41PM.	BAN Closed this trouble ticket, but did not explain why we were unable to connect with their server/IP address. They only stated that BAN would conduct an investigation - internally.

779977	No Response	10/6/99	10/6/99	None to Date	The average retrieval time for CSRs was 23 minutes. This problem started at 11:26AM and went until 2:08PM.	BAN told us that the FTP queue was backed up.
780431	No Response	10/7/99	10/7/99	After we opened a TT.	Bell Atlantic is currently rejecting all CSR inquiry transactions sent via EDI. A severity 1 ticket has been opened with BA to get this resolved.	Problem cleared on its own, root cause still under investigation. Closed by BAN without explanation.
780750	Non Uniform Response Times	10/7/99	10/7/99	None to Date	Bell Atlantic is currently rejecting all CSR inquiry transactions sent via EDI. A severity 1 ticket has been opened with BA to get this resolved.	BAN said that the FTP Daemons were hung and they reset them at 10:35 AM. I was also told that they are implementing a process to better track the response time to MCIWorldCom.
784815	No Response	10/12/99	OPEN	None to Date	Response time spikes on the hour from 10AM to 2PM on Oct. 2nd.	
785725	No Response	10/13/99	OPEN	None to Date	TT Opened concerning 17 no responses from BAN at 12:40PM	They are investigating.
785972	No Response	10/13/99	OPEN	After a TT was opened.	1500+ no responses from BAN, starting at 1:56PM - total failure to CSR requests from BAN. Opened TT at 2:45PM. Network was down on Oct. 13th & 14th.	This turned out to be a problem in the network between MCIWorldCom and BAN. A DS3 line was down at a data center.
787039	No Response	10/14/99	10/14/99	None to Date	Handshake failure once Network problem was resolved and our systems were brought back up. Lee Anderson called Richard Bowers at BAN to notify them of this issue at 2:50PM. Dan Kalhoon at BAN called back (at 2:54PM) to tell us that they had to reset the interactive agent to re-establish a successful handshake with MCIWorldCom.	This has been resolved.
788290	Non Uniform Response Times	10/15/99	OPEN	None to Date	We are seeing longer than normal BAN response time between 8 & 8:30PM (some as high as 72 seconds). I gave 4 INQ #s as well as TNs. (00046766BANSXEPX - 46768 & 46653.)	BAN has called back on 10/18 to let Todd know that they are investigating this.
788370	No Response	10/16/99	OPEN	None to Date	Reported what looked to be a connection problem in which we were getting "No Response" from BAN. The "No Response" actually turned out instead to be that we were getting a response from BAN of "System Error: Unable to access DB". This is not a valid error from BAN. Therefore resulted in timeout errors at the desktop.	BAN is investigating and will report back.
They would not give a TT#	No Response	10/20/99	OPEN	None to Date	No response from BA-N from 16:40:00 - 16:59:00.	BA-N's ECX4 box that we are connected to had a queue build up due to Sprint keeping a consistant FTP session with BA-N
793910	No Response	10/21/99	OPEN	None to Date	No response from BA-N from 19:52:11 - 20:46:16+.	They are investigating.

They would not give a TT#	No Response	10/23/99	OPEN	None to Date	No response from BA-N from 12:07:43 - 12:21:18.	BA-N's ECX4 box that we are connected to had a queue build up due to Sprint keeping a consistant FTP session with BA-N
797595	No Response	10/26/99	OPEN	None to Date	Major BA-N outage last night from 19:45 to 21:08 (19:45 to 20:19 we had no response from BA-N and from 20:19 to 21:08 we received an error response from BA-N) which resulted in 648 desktop timeouts and another 178 other error responses from BA-N. Trouble ticket #797595 was opened and problem was resolved at 9:18PM. BA-N has not yet given any reason as to why they were down.	They are investigating.
798837	No Response	10/27/99	OPEN	Yes	No response from BA-N, then received late responses (up to 33 minutes) from 20:00:00 to 20:30:00. Gave BA-N INQ#s, IP address and general information concerning outage and late responses.	BA-N's ECX4 box that we are connected to had a queue build up alledgedly due to Sprint keeping a consistant FTP session with BA-N
799124	No Response	10/28/99	OPEN	None to Date	No response from BA-N from 8:00:00+. We gave INQ#s and IP address information.	BAN told us that the FTP queue was backed up.
799977	No Response	10/28/99	OPEN	None to Date	No response from BA from 18:31:36 - 19:56:00 due to they were either down with NO RESPONSE or responding with "System Unavailable".	
800001	No Response	10/28/99	10/28/99	None to Date	No response from BAN from 20:15:00 - 20:49:00	Stayed on open bridge with BAN from 20:20:00 to 20:49:00, then BAN is back up again without providing detail of outage. BAN POC keep MCIW on phone until problem was resolved without root cause.
801221	No Response	10/30/99	OPEN	None to Date	Unable to access BAN's Database	BAN's Helpdesk did not inform us of their backend issue because they said it has to affect more than 1 CLEC in order for a page to be sent. At 9:50 AM MST, BAN requested MCIW to send some requests through and they received responses. No root cause provided to substantiate issue and the information provided to MCIW from BA was inaccurate.
803844	No Response	11/2/99	OPEN	None to Date	No response from BA from 2:32:00 - 3:08:00 PM	BA Helpdesk placed MCIW on bridge to determine root cause of issue but there was too much confusion on the call. MCIW was on the phone from 3:06 - 3:56 PM after which BA would not reveal or determine root cause of outage since it fixed itself around 3:10 PM.
803984	No Response	11/2/99	11/3/99	None to Date	No responses from BA from 18:32:00 PM 11/2 - 9:30:00 AM 11/3	It was determined that this issue was an MCIW internal EDICT issue and not Bell Atlantic's.
804438	No Response	11/3/99	OPEN	None to Date	No responses from BA from 10:00:00 AM - 12:27:00 PM Error message returned "Accessor not available"	BA said that CSR Parser was down but was not really clear to root cause of outage. As of 12:27 PM BA was processing requests again. Data flow was restored at 10 AM but BA began responding with errors with every request.
804621	No Response	11/3/99	OPEN	None to Date	No responses from BA from 10:00:00 AM - 12:27:00 PM Error message returned "Accessor not available"	BA said that CSR Parser was down but was not really clear to root cause of outage. As of 12:27 PM BA was processing requests again. Data flow was restored at 10 AM but BA began responding with errors with every request.

805201	No Response	11/3/99	OPEN	None to Date	Slow responses, changing to no responses at 18:51:00 PM	At 20:31:00 PM BA began returning responses on requests. Root Cause is still under investigation.
805910	No Response	11/4/99	11/4/99	None to Date	No responses from BA starting at 12:30:00 PM	BA had reached their IA (Interactive Agent) socket limit and thus recycled their IA and the problem was cleared.
806197	No Response	11/4/99	11/4/99	None to Date	Slow responses, changing to no responses at 14:57:00 PM	BA said that there IA had to be restarted and at 16:35:00 PM the problem was corrected and requests started receiving responses
806234	No Response	11/4/99	11/4/99	None to Date	No responses starting at 18:07:00 PM	Reported reason for outage: Interactive agent recycled, problem cleared.Other info: At 19:14:00 PM, they recycled machine, but then encountered another error with that machine (couldn't "bind to sockets on host"). Troubleshot that error, recycled again, problem cleared at 19:32:00.

SUPPLEMENTAL JOINT DECLARATION OF SHERRY LICHTENBERG AND JOHN SIVORI

ATTACHMENT 2

Date: Fri, 05 Nov 1999 18:09 -0500 (EST)
From: "Allison O'Neill" <Allison.Oneill@mci.com>
To: "'Jennifer. E. Ross (E-mail)" <jennifer.e.ross@bellatlantic.com>
CC: "Marion. C. Jordan (E-mail)" <marion.c.jordan@BellAtlantic.com>,
    <lissa.provenzo@wcom.com>,
    <vincent.clements@wcom.com>,
    <john.sivori@wcom.com>,
    <charlene.keys@wcom.com>,
    <daniel.c.muchnok@bellatlantic.com>
Importance: High
Subject: Preorder Escalation

Jenny,

On October 13, 1999, Bell Atlantic requested that MCI WorldCom move off the
ECX3 server box to ECX4 server box. Bell Atlantic assured MCI WorldCom that
this move to a new server box would eliminate the roller coaster of outages
experienced with ECX3. Unfortunately, the problems actually have increased
as a result of the change.
In the past several weeks MCI WorldCom has opened multiple trouble tickets
regarding Bell Atlantic North's unstable CSR environment. The trouble
tickets, which are detailed in the attached document, cover a number of
issues including:
1. SSL3 interactive TCPIP Failures.
2. Handshake failures with BA systems.
3. BA system outages.
4. System unavailability error messages during Bell Atlantic Operational
hours.
5. CSR Inquiries sent with no response.
6. CSR responses taking over 72 seconds to respond.
MCI WorldCom continues to experience system failures at MCIW peak hours
which are from 6:00 P.M. to 9:00 P.M. as well as experiencing an all day
outage on 11/4.
MCI WorldCom is also experiencing problems with the BA help desk during
weekday and weekend hours. Bell Atlantic Help Desk Representatives do not
have knowledge of, or recognize, the MCIW set up of the SSL3 Inter Active
Agent, resulting in a constant education of SSL3, Inter Active, and IP
address. In addition, some Bell Atlantic Representatives have put MCIW on
hold for as long as 1 hour and 45 minutes and have refused to open a trouble
ticket. Trouble tickets are being closed without providing root cause to
MCIW production contacts.
On 11/4/99, MCI WorldCom initiated discussions with Dan Muchnok regarding
the issues listed above. On 11/5, a conference call between Bell Atlantic
and MCIW produced the following action items:

A. BA has determined one cause of the outages was with the Interactive Agent that was preventing the
'File Descriptor Block' to be released. BA's fix to correct this problem
will be implemented on Friday, November 05,
1999 at 11 PM EST.

B. Bell Atlantic will research why MCI WorldCom is receiving slow responses during peak calling hours of 6 - 9 PM weekdays. Bell Atlantic will obtain feedback from Middleware and SOPs Technical groups to research this issue.

C. MCI WorldCom will verify with network group about T1 LAN connection.

D. Bell Atlantic to provide an on-call technical support person for the production fix scheduled for Friday, November 05, 1999 at 11PM.

E. Bell Atlantic will provide Lissa Provenzo (MCI WorldCom) with contact information including, cell phone and pager numbers.

F.   Bell Atlantic will provide support to stand by and monitor EDI
transactions starting on Monday, November 8 - Friday,
        November 12, from 9:00 AM - 9:00 PM.

G. Bell Atlantic Help Desk will ensure that their support personnel are aware of MCI WorldCom's profile and special monitoring process starting on Monday, November 8, 1999.

H. Bell Atlantic Help Desk will address the lack of pages sent to MCI WorldCom during an outage.

I. Bell Atlantic will provide support for Saturday thru Sunday, November 6 - 7, for the normal business hours. In addition, if a Production issue arises then Dan Cahoon and Richard Bowers will need to be contacted in case code needs to be backed out.

J. Bell Atlantic will verify operational hours documented from their BA Handbook to address the "System Unavailable" issues encountered during the weekend hours.

K. Bell Atlantic will have one point of contact page and bridge all appropriate technical subject matter experts (SME's) for issue resolution when outage or problem occurs.

L. MCI WorldCom to set up bridge for follow up meeting to discuss Pre Order production from 11/5 - 11/8 on Tuesday, 11/9 at 11 AM.

In addition to these actions, MCI WorldCom requests that Bell Atlantic provide root cause analysis and a written plan of action to monitor and eliminate the reoccurring outages at a face to face meeting on Friday, November 12. MCI WorldCom is requesting a response from Bell Atlantic on Monday 11/8/99.
Allison O'Neill
MCI WorldCom
Carrier Management/OSS Implementation
770-625-6846

Enclosures:

BINARY:TROUBLETICKETS_11-4-99.XLS saved in
C:\PROGRA~1\MAILROOM\ENCLOSE\TROUBLETICKETS_11-4-99.XLS